

PATRICK L. FORTE, #80050
ANNE Y. SHIAU, #273709
LAW OFFICES OF PATRICK L. FORTE
One Kaiser Plaza, #480
Oakland, CA 94612
Telephone: (510) 465-3328
Facsimile: (510) 763-8354

Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re: **Case No. 10-49797 EDJ**
TERESA DEGUZMAN DEVERA, **Chapter 13**
Debtor. **MOTION TO MODIFY CHAPTER 13 PLAN**

The above-named debtor applies to the court for an order to modify her Chapter 13 Plan as follows:

Debtor shall include her 2010 income tax debt owed to the Internal Revenue Service, in the amount of \$33,204.00 with 4% interest to her Chapter 13 plan. Commencing December 2011, debtor will pay \$1,063.00 per month to the Trustee. Any plan arrearages shall be forgiven. Unsecured, non-priority creditors shall be paid on a pro-tanto basis.

The modification is sought on the following grounds:
Debtor is unable to pay her 2010 income tax debt in full in addition to her Chapter 13 Plan payment. Debtor can afford to pay her tax debt if it is included as part of her Chapter 13 Plan.

Dated: December 20, 2011

/s/ Anne Y. Shiau
Anne Y. Shiau
Attorney for Debtor